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*Attorney for Plaintiff*

UNITED STATES DISTRICT COURT  
 WESTERN DISTRICT OF WASHINGTON  
 SEATTLE, WASHINGTON

JUAN ALBERTO  
 CASTANEDA MIRANDA,

Plaintiff,

vs.

U.S. DRUG  
 ENFORCEMENT  
 ADMINISTRATION, a U.S.  
 government agency; U.S.  
 FEDERAL BUREAU OF  
 INVESTIGATION, a U.S.  
 government agency; and  
 U.S. BUREAU OF  
 ALCOHOL, TOBACCO,  
 FIREARMS &  
 EXPLOSIVES, a U.S.  
 government agency;  
 AGENT AGUIRE, BADGE  
 NO. 7785, an employee for  
 the U.S. federal government;

FILE NO.

COMPLAINT FOR  
 DAMAGES

1. Unreasonable Search  
 and Seizure –  
 Detention and Arrest  
 (42 U.S.C. § 1983)
2. Unreasonable Search  
 and Seizure –  
 Excessive Force (42  
 U.S.C. § 1983)
3. Substantive Due  
 Process – (42 U.S.C. §  
 1983)
4. Municipal Liability  
 for Unconstitutional  
 Custom, Practice or

COMPLAINT - 1

AGENT MORELAND,  
BADGE NO. 7701, an  
employee for the U.S.  
federal government; and  
UNKNOWN NAMED  
AGENTS OF THE U.S.  
FEDERAL BUREAU OF  
INVESTIGATION, U.S.  
DRUG ENFORCEMENT  
ADMINISTRATION, U.S.  
BUREAU OF ALCOHOL,  
TOBACCO, FIREARMS &  
EXPLOSIVES 1-10,  
inclusive,

Defendants.

Policy (42 U.S.C. §  
1983)

5. Municipal Liability –  
Failure to Train (42  
U.S.C. § 1983)

6. Plausible Claim for  
Relief Against  
Defendants Under  
*Bivens*

***JURY TRIAL DEMANDED***

## I. INTRODUCTION

1.1 Plaintiff, JUAN ALBERTO CASTANEDA MIRANDA, an  
unmarried father of a minor child, brings this civil rights action seeking  
compensatory and punitive damages from Defendants for violating various  
rights under the United States Constitution and state law against Defendants  
for their failures to perform mandatory duties and/or for the unconstitutional  
and/or negligent acts and/or omissions of their officers, officials, agents  
and/or employees that resulted in the injuries to the Plaintiff and his personal  
property, related to improper identification and raid of the Plaintiff, his  
girlfriend at that time, and their apartment and vehicle.

1.2 This tragic series of events occurred on July 17, 2018.

COMPLAINT - 2

1.4 Defendants learned during the raid of Plaintiff, his apartment, his vehicle and his then girlfriend that Defendants had the wrong apartment and wrong person for which they were to conduct the raid.

1.6 Defendants' failure to carry out their required duties and to properly identify Plaintiff caused significant injury and damage to the Plaintiff.

1.7 If Defendants would have simply followed the laws, regulations and/or procedures, this incident and harm could have been avoided.

2.1 This Court has jurisdiction over all causes of action asserted against Defendants.

2.2 Plaintiff further brings this cause of action against the United States pursuant to 28 U.S.C.S. § 2679(a); 42 U.S.C. §§ 1983, 1985, 1986,

1 1988; Fourth and Fourteenth Amendments of the United States Constitution;  
2 and 28 U.S.C. § 2674. Jurisdiction is founded on 28 U.S.C. §§ 1331, 1343  
3 and 1367.

4 2.3 This is an action brought under the United States Constitution  
5 pursuant to *Bivens v. Six Unknown Named Agents of Federal Bureau of*  
6 *Narcotics*, 403 U.S. 388 (1971), for the unlawful search and seizure of  
7 Plaintiff's home, vehicle and belongings in violation of Plaintiff's Fourth  
8 Amendment rights; and racial and ethnic profiling in violation of Plaintiff's  
9 Equal Protection and Due Process rights.  
10

11 2.4 Venue is proper in this Court under 28 U.S.C. § 1391(b),  
12 because Defendants reside in, and all incidents, events, and occurrences  
13 giving rise to this action occurred in the County of Snohomish, Washington.  
14

### 15 III. PARTIES

16 3.1 Plaintiff, JUAN ALBERTO CASTANEDA MIRANDA, is a  
17 citizen of Mexico. He resides in the United States with approved Deferred  
18 Action for Childhood Arrivals (DACA). Plaintiff resides in Everett,  
19 Washington.  
20

21 3.2 Defendant, U.S. DRUG ENFORCEMENT  
22 ADMINISTRATION, is a U.S. government agency, with offices in the state  
23 of Washington.  
24  
25

1           3.3 Defendant, FEDERAL BUREAU OF INVESTIGATION, is a  
2 U.S. government agency, with offices in the state of Washington.

3           3.4 Defendant, U.S. BUREAU OF ALCOHOL, TOBACCO,  
4 FIREARMS & EXPLOSIVES, is a U.S. government agency, with offices in  
5 the state of Washington.  
6

7           3.5 Defendant, AGENT AGUIRE, BADGE NO. 7785, is an  
8 employee for the U.S. federal government.  
9

10          3.6 Defendant, AGENT MORELAND, BADGE NO. 7701, is an  
11 employee for the U.S. federal government.

12          3.7 Defendants, UNKNOWN NAMED AGENTS OF THE U.S.  
13 FEDERAL BUREAU OF INVESTIGATION, U.S. DRUG  
14 ENFORCEMENT ADMINISTRATION, U.S. BUREAU OF ALCOHOL,  
15 TOBACCO, FIREARMS & EXPLOSIVES 1-10, inclusive, are unknown to  
16 Plaintiff, who therefore sue these defendants by such fictitious names.  
17 Plaintiff will seek leave to amend this Complaint to show the true names and  
18 capacities of these defendants when they have been ascertained. Each of the  
19 fictitious named defendants is responsible in some manner for the conduct  
20 and liabilities alleged herein.  
21  
22

#### 23                   IV. FACTUAL ALLEGATIONS

24

1           4.1    Plaintiff is a citizen and native of Mexico. He was born on May  
2 25, 1992.

3           4.2    Plaintiff is the recipient of approved and current Deferred  
4 Action for Childhood Arrivals.

5           4.3    Plaintiff is employed as technician for Comcast.

6           4.4    Plaintiff is not married.

7           4.5    Plaintiff has one minor child, a U.S. citizen daughter.

8           4.6    Other than a couple of speeding tickets, Plaintiff has no  
9 criminal history. He is not and has never been violent nor been seen as a  
10 threat to his community. Plaintiff has not and has never been connected with  
11 drug manufacturing, use or sales.

12           4.7    Plaintiff does not and has never had a license to carry or keep  
13 firearms.

14           4.8    Plaintiff has had no history of violence and no history of drug  
15 offenses.

16           4.9    On July 13, 2018, the U.S. District Court for the Western  
17 District of Washington, Seattle, Washington, issued a Search and Seizure  
18 Warrant to search the Plaintiff's apartment at Viking Apartments, 6630  
19 202<sup>nd</sup> Street SW, Lynnwood, Washington 98036. This warrant specifically  
20

1 outlined the purpose for this search and seizure - to locate controlled  
2 substances, drug paraphernalia, drug transaction records, etc.

3 4.10 On July 17, 2018, Defendants in this matter raided and  
4 destroyed the Plaintiff's apartment, killing his cat, and causing injuries to  
5 Plaintiff.  
6

7 4.11 On July 17, 2018, Plaintiff and his then girlfriend, Gisela  
8 Alarcon Castaneda, were awakened by loud bangs outside of their  
9 apartment; still sleeping, they did not realize what was going on until agents  
10 blasted into their apartment and they were suddenly approached by full-  
11 armored agents, who came into their bedroom, with multiple guns raised and  
12 pointed at them, yelling at Plaintiff and his girlfriend. They were instructed  
13 to get out of bed, but neither one had clothing on. Ms. Castaneda required a  
14 female agent to come to the scene to help Ms. Castaneda dress. Plaintiff  
15 pleaded with the agents to look in his wallet to see that they had the wrong  
16 apartment and wrong person(s). These pleas were ignored by all of the  
17 government agents during this excessive raid.  
18  
19  
20

21 4.12 Plaintiff and his girlfriend were handcuffed and taken to the  
22 living room, where Plaintiff was told to "confess" about the "drug cartels";  
23 however, Plaintiff was not, is not and has not ever been involved with any  
24 type of drug trafficking, so he did not know what the agents were referring  
25

1 to and desperately tried to tell agents he did not know anything. He asked  
2 agents to check his identification, so they could see that they were in the  
3 wrong apartment, but they refused.

4 4.13 After Defendants had torn up Plaintiff's apartment and vehicle,  
5 nothing was found related to any drug or other illegal activity, by Plaintiff  
6 nor his girlfriend, the Defendants handed Plaintiff a packet of documents  
7 and told him the Defendants had the wrong individuals and the wrong  
8 apartment and to complete the claim forms for reimbursement of damages  
9 and settlement for all harm and damage. Defendants failed to discover and  
10 reasonably should have discovered by looking at Plaintiff's identification  
11 that they were, in fact, in the wrong residence.

12 4.14 During the July 17, 2018 raid by Defendants of Plaintiff's  
13 apartment and his vehicle, it was determined that Defendants had the  
14 incorrect person(s) and incorrect apartment. Eventually, Defendants  
15 arrested and charged the correct defendant(s) they were looking for and  
16 these defendants were charged accordingly. *See USA v. Urias, et al.*, Case  
17 No. 2:18-CR-00174-RAJ.

18 4.15 Plaintiff has suffered significant personal injuries, wage loss  
19 and property damage from the Defendants wrongful arrest, search and  
20



1 seizure and destruction of his personal belongings, and violation of his 4<sup>th</sup>  
2 and 5<sup>th</sup> Amendment rights.

3 **V. FIRST CLAIM FOR RELIEF**

4 **1. Unreasonable Search And Seizure – Detention And Arrest,**  
5 **U.S.C. § 1983).**  
6

7 5.1 Plaintiff hereby incorporates by reference each of the  
8 allegations set forth in the preceding paragraphs as if realleged fully herein.  
9

10 5.2 Defendants caused Plaintiff to be detained and attempted to  
11 arrest Plaintiff in violation of his right to be secure in his person against  
12 unreasonable searches and seizures as guaranteed to Plaintiff under the  
13 Fourth Amendment of the United States Constitution and applied to state  
14 actors by the Fourteenth Amendment.  
15

16 5.3 As a result of the conduct of the Defendants, they are liable for  
17 Plaintiff's injuries because they were integral participants to the violations  
18 of Plaintiff's rights.  
19

20 5.4 The Plaintiff was detained without reasonable suspicion by  
21 Defendants, and they attempted to arrest Plaintiff without probable cause.  
22

23 5.5 The conduct of Defendants was willful, wanton, malicious, and  
24 done with reckless disregard for the rights and safety of Plaintiff and,  
25

1 therefore, warrants the imposition of exemplary and punitive damages as to  
2 Defendants.

3 5.6 Accordingly, Defendants are each liable to Plaintiff for  
4 compensatory and punitive damages under 42 U.S.C. § 1983.  
5

6 5.7 Plaintiff also seeks attorney fees under this claim.

## 7 VI. SECOND CLAIM FOR RELIEF

8 2. Unreasonable Search and Seizure – Excessive Force, 42  
9 U.S.C. § 1983).  
10

11 6.1 Plaintiff hereby incorporates by reference each of the  
12 allegations set forth in the preceding paragraphs as if realleged fully herein.

13 6.2 Defendants unjustified arrest, search and seizure of his person,  
14 place, and things deprived Plaintiff of his right to be secure in his person  
15 against unreasonable search and seizure as guaranteed to Plaintiff under the  
16 Fourth Amendment to the United States Constitution and applied to state  
17 actors by the Fourteenth Amendment.  
18

19 6.3 The unreasonable use of force by Defendants deprived Plaintiff  
20 of his right to be secure in his person against unreasonable searches and  
21 seizures as guaranteed to Plaintiff under the Fourth Amendment to the  
22 United States Constitution and applied to state actors by the Fourteenth  
23 Amendment.  
24  
25

1           6.4    As a result, Plaintiff suffered extreme mental and physical pain  
2 and suffering, loss of enjoyment of life and eventually suffered loss of  
3 visitation with his young daughter, his relationship with girlfriend, and  
4 earning capacity.

5  
6           6.5    The conduct of Defendants was willful, wanton, malicious, and  
7 done with reckless disregard for the rights and safety of Plaintiff and,  
8 therefore, warrants the imposition of exemplary and punitive damages as to  
9 the Defendants.

10  
11           6.6    Plaintiff brings this claim seeking damages for violation of  
12 Plaintiff's rights.

13           6.7    Plaintiff also seeks attorney fees under this claim.

## 14                               **VII. THIRD CLAIM FOR RELIEF**

### 15                   **3. Substantive Due Process, 42 U.S.C. § 1983.**

16  
17           7.1    Plaintiff hereby incorporates by reference each of the  
18 allegations set forth in the preceding paragraphs as if realleged fully herein.

19  
20           7.2    Plaintiff had a cognizable interest under the Due Process Clause  
21 of the Fourteenth Amendment of the United States Constitution to be free  
22 from state actions that deprive him of life, liberty, or property in such a  
23 manner as to shock the conscience, including, but not limited to,  
24 unwarranted state interference in Plaintiff's own home and person.

1           7.3 As a result of the excessive forced by Defendants, Plaintiff was  
2 thereby deprived of his constitution right to reside peaceably in his home,  
3 protect his privacy, to be void of unreasonable search and seizure, protected  
4 from excessive use of force by government agents acting in dereliction of  
5 their duties and incompetent due diligence in exercising a search and arrest  
6 warrant.  
7

8           7.4 The actions of Defendants, along with other undiscovered  
9 conduct, shock the conscience, in that Defendants acted with deliberate  
10 indifference to the constitutional rights of Plaintiff with purpose to harm  
11 unrelated to any legitimate law enforcement objective related to Plaintiff.  
12

13           7.5 Defendants, acting under color of state law, thus violated the  
14 Fourteenth Amendment rights of Plaintiff.  
15

16           7.6 As a direct and proximate cause of the acts of Defendants,  
17 Plaintiff suffered extreme and severe mental anguish and pain and have been  
18 injured in mind and body.  
19

20           7.7 Plaintiff has also been deprived of the life-long love,  
21 companionship, comfort, support, society, care and sustenance with his  
22 young daughter, as he has not been allowed to see his daughter since this  
23 July 17, 2018, raid by Defendants.  
24  
25

1           7.8 As a result of the conduct of Defendants, the Defendants are  
2 liable for Plaintiff's injuries because Defendants were integral participants  
3 in the denial of due process.

4           7.9 The conduct of Defendants was willful, wanton, malicious and  
5 done with reckless disregard for the rights and safety of Plaintiff and,  
6 therefore, warrants the imposition of exemplary and punitive damages as to  
7 each of the Defendants.

8  
9           7.10 Plaintiff brings this claim seeking damages for violation of his  
10 rights.

11  
12           7.11 Plaintiff also seeks attorney fees under this claim.

13                           **VIII. FOURTH CLAIM FOR RELIEF**

14                   **4. Federal, City, County and Municipal Liability for**  
15 **Unconstitutional Custom or Policy, 42 U.S.C. § 1983.**

16  
17           8.1 Plaintiff hereby incorporates by reference each of the  
18 allegations set forth in the preceding paragraphs as if realleged fully herein.

19  
20           8.2 On or about July 17, 2018, and continuing to the present date,  
21 Defendants deprived Plaintiff of the rights and liberties secured to him by  
22 the Fourth and Fourteenth Amendments to the United States Constitution, in  
23 that said Defendants and their supervising and managerial employees,  
24 agents, and representatives, acting with gross negligence and with reckless  
25

1 and deliberate indifference to the rights and liberties of the public in general,  
2 and of Plaintiff, and of persons in their class, situation and comparable  
3 position in particular, knowingly maintained, enforced and applied an  
4 official recognized custom, policy, and practice of:

5  
6 (a) Employing and retaining as police officers and other personnel,  
7 including all Defendants in this matter, at all times material herein, knew or  
8 reasonably should have known, had dangerous propensities for abusing their  
9 authority and for mistreating citizens by failing to follow written federal,  
10 state and city police department policies,

11  
12 (b) Of inadequately supervising, training, controlling, assigning,  
13 and disciplining federal agents, police officers and other personnel, who  
14 Defendants knew or in the exercise of reasonable care should have known  
15 had the aforementioned propensities and character traits,

16  
17 (c) By failing to adequately train officers, including all Defendants  
18 in this matter, and failing to institute appropriate policies, regarding the use  
19 of excessive force,

20  
21 (d) By having and maintaining an unconstitutional policy, custom,  
22 and practice of using excessive force, including deadly force, which also is  
23 demonstrated by inadequate training regarding these subjects. The policies,  
24  
25

1 customs, and practices of Defendants, were done with a deliberate  
2 indifference to individuals' safety and right, and

3 (e) By reason of the aforementioned policies and practices of  
4 Defendants, Plaintiff was severely injured and subjected to pain and  
5 suffering, and loss.  
6

7 8.3 Defendants, together with various other officials, whether  
8 named or unnamed, had either actual or constructive knowledge of the  
9 deficient policies, practices and customs alleged in the paragraphs above.  
10 Despite having knowledge as stated above, the Defendants condoned,  
11 tolerated and through actions and inactions thereby ratified such policies.  
12 Defendants also acted with deliberate indifference to the foreseeable effects  
13 and consequences of these policies with respect to the constitutional rights  
14 of Plaintiff and other individuals similarly situated.  
15  
16

17 8.4 By perpetrating, sanctioning, tolerating and ratifying the  
18 outrageous conduct and other wrongful acts, Defendants acted with reckless,  
19 and callous disregard for Plaintiff, violating Plaintiff's constitutional rights.  
20 Defendants' actions were willful, wanton, oppressive, malicious, fraudulent,  
21 and extremely offensive and unconscionable to any person of normal  
22 sensibilities.  
23  
24  
25

1           8.5   Furthermore, the policies, practices, and customs implemented  
2 and maintained and still tolerated by Defendants, were affirmatively linked  
3 to and were a significant influential force behind the injuries of Plaintiff.

4           8.6   By reason of the aforementioned acts and omissions of  
5 Defendants, Plaintiff suffered extreme and severe mental anguish and pain  
6 and have been injured in mind and body, wage loss, love, companionship,  
7 affection, comfort, care, society and future support from his girlfriend, and  
8 time, love, companionship, affection, comfort, care, society and future  
9 support with his minor child daughter.  
10

11           8.7   Accordingly, Defendants each are liable to Plaintiff for  
12 compensatory damages under 42 U.S.C. § 1983.  
13

14           8.8   Plaintiff brings this claim seeking damages for violation of his  
15 rights.  
16

17           8.9   Plaintiff also seeks attorney fees under this claim.  
18

## 19                           **IX.    FIFTH CLAIM FOR RELIEF**

20           **5.    Federal, City, County and Municipal Liability – Failure to**  
21 **Train, 42 U.S.C. § 1983.**

22           9.1   Plaintiff hereby incorporates by reference each of the  
23 allegations set forth in the preceding paragraphs as if realleged fully herein.  
24



1           9.2 While acting under the color of federal, city, county and  
2 municipal law, and within the course and scope of their employment as  
3 federal agents, county officers, city officers, and municipal officers of law  
4 enforcement, Defendants unlawful arrest, search and seizure, deprived  
5 Plaintiff of his rights and liberties secured to him by the Fourth and  
6 Fourteenth Amendments, including his right to be free from unreasonable  
7 search and seizure.  
8

9           9.3 The training policies of the Defendant agencies were not  
10 adequate to train its agents and officers regarding valid search and seizures  
11 and arrests. As a result, Defendants are not able to handle the usual and  
12 recurring situations with which they must deal, including due diligence and  
13 provision of accuracy of information for a valid search and arrest warrant,  
14 and entering into an individual's home, after securing the premises, making  
15 proper identification of those held in Defendants' custody.  
16  
17

18           9.4 Defendants were deliberately indifferent to the known or  
19 obvious consequences of its failure to train its police officers adequately  
20 regarding search and seizures and arrests. This inadequate training includes  
21 proper identification of arrestees during a home raid, search and seizure.  
22  
23  
24  
25

1           9.5    The failure of Defendants to provide adequate training is so  
2 closely related to the deprivation of the Plaintiff's rights as to be the moving  
3 force that caused Plaintiff's injuries.

4           9.6    By failing to provide adequate training to Defendants, it  
5 officers, agents, and employees, Defendants acted with an intentional,  
6 reckless, and callous disregard for Plaintiff's constitutional rights.  
7 Defendants' actions were willful, wanton, oppressive, malicious, fraudulent,  
8 and extremely offensive and unconscionable to any person of normal  
9 sensibilities.  
10

11           9.7    By reason of the acts and omissions of the Defendants, Plaintiff  
12 was caused to incur property damage, and wage loss.  
13

14           9.8    By reason of the acts and omissions of the Defendants, Plaintiff  
15 has suffered loss of love, companionship, affection, comfort, care, society,  
16 and future support from his then girlfriend, Gisela Alarcon Castaneda, and  
17 time, love, companionship, affection, comfort, care, society and future  
18 support with his minor child daughter.  
19

20           9.9    Accordingly, Defendants are liable to Plaintiff for  
21 compensatory damages under 42 U.S.C. § 1983.  
22

23           9.10   Plaintiff brings this claim seeking damages for violation of his  
24 rights.  
25

1 9.11 Plaintiff also seeks attorney fees under this claim.

2 **X. SIXTH CLAIM FOR RELIEF**

3 **6. Plaintiff Asserts a Plausible Claim for Relief Against**  
4 **Defendants Under *Bivens*.**

5  
6 10.1 Plaintiff hereby incorporates by reference each of the  
7 allegations set forth in the preceding paragraphs as if realleged fully herein.

8 10.2 Plaintiff's constitutional rights were violated by Defendants,  
9 which give rise to an action for monetary damages pursuant to 28 U.S.C. §  
10 1331.  
11

12 10.3 Defendants have deprived Plaintiff of rights, privileges, or  
13 immunities secured by the Constitution or laws of the United States.

14 10.4 Plaintiff also seeks attorney fees under this claim.  
15

16 **XI. JURY DEMAND**

17 11.1 Plaintiff demands a trial by jury of all issues so triable.  
18

19 **XII. CLAIM FOR DAMAGES**

20 12.1 Plaintiff has suffered special damages from the July 17, 2018,  
21 raid by Defendants in this matter in the amount of \$40,076.60.

22 12.2 Plaintiff has suffered damages for pain and suffering from this  
23 botched raid by Defendants. These damages are in excess of \$5,000,000.00  
24 and will be determined at trial.  
25

1 12.3 Punitive damages should be awarded to Plaintiff for  
2 Defendants reckless and excessive use of force on Plaintiff, only to find that  
3 Defendants had raided to wrong house and the wrong person causing  
4 excessive damage to Plaintiff and his personal property and loss of work.  
5

6 12.4 Plaintiff lost his girlfriend over this botched raid by  
7 Defendants. Defendants killed Plaintiff's cat as a result of this raid.  
8 Defendants destroyed all of Plaintiff's personal belongings, including his  
9 only vehicle, which allowed him to get back and forth to work. He had time  
10 loss from work. He was forced to move from his apartment because the  
11 apartment and his personal belonging had all been destroyed by Defendants.  
12 Plaintiff's name is still not clear from all reporting agencies due to this  
13 wrongful and inaccurate raid and arrest of Plaintiff. Plaintiff is specialized  
14 in his employment, which requires at times strict security clearance; this  
15 incident has prevented Plaintiff from clearing these security clearances and  
16 has prevented him for performing his specialized work duties with  
17 sophisticated internet installations for his employer.  
18  
19  
20

21 12.5 Plaintiff requests that his name be cleared from all records with  
22 Defendants and any other reporting agency, so that he will not have this  
23 botched and reckless event continue to smear his name legally and socially.  
24  
25

12.6 As a result of the irrational use of excessive force on Plaintiff, Defendants caused extreme physical, mental and emotional harm to the Plaintiff during this botched drug raid by Defendants.

12.7 The sense of security Plaintiff once felt in the presence of his own home and with law enforcement officers has been irretrievably broken and replaced with understandable fear. Because Defendants have still not fully removed Plaintiff's name from federal records as having been involved in a drug investigation, Plaintiff is still plagued by this disastrous and violent raid on him, his home, his vehicle, his girlfriend, and his family pet – continuing to cause him harm when, in fact, Defendants had the wrong apartment and wrong person and would not even check Plaintiff's identification before the destruction and harm occurred despite Plaintiff's pleas.

### **XIII. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff demands that this Court award the following:

13.1 Special damages in excess of \$40,076.60,

13.2 Punitive damages in excess of \$5,000,000.00,

13.3 Costs incurred in this action and reasonable attorney fees,

13.4 Prejudgment and post-judgment interest, and

1 13.5 Such other and further relief the Court deems just and proper.

2 RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of July 2021.

3  
4 /s/ Patrick Patton

5 PATRICK PATTON, WSBA 49159

6 Salish Sea Law Group

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11 patrick@salishsealawgroup.com

12 *Attorney for Plaintiff*

**JURY DEMAND**

Plaintiff hereby demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure.

DATED this 16<sup>th</sup> day of July 2021.

/s/ Patrick Patton

PATRICK PATTON, WSBA 49159  
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